



Re:

Peter Andrews <pandrews@theharmanfirm.com>

Mon, Oct 28, 2013 at 10:53 AM

To: "Windholz, Diane (NYC)" <Windhold@jacksonlewis.com>

Cc: "McCabe, Orla J. (NYC)" <Orla.McCabe@jacksonlewis.com>, "Windholz, Diane (NYC)" <Windhold@jacksonlewis.com>, Walker Harman <wharman@theharmanfirm.com>, Lucas Larson <llarson@theharmanfirm.com>

This is not proper, and no I am not available today to pay a visit to your office to review documents. I have an unrelated deposition in lower manhattan in three hours.

If you have not given us responsive documents and you intend to use them to examine Michael, we are going to have a big problem. It is not proper to simply tell me that there are some documents at your office and that maybe I can pass by one day to see them.

I am bringing Judge Pauley's phone number with me. It is ironic that you have been pounding me relentlessly about Mr. Kamens' production when you yourself are admitting that you have not produced documents which you apparently intend to use at tomorrow's deposition.

Peter

Sent from my iPhone